

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

EXPERIMENTAL PRESORTED PRIORITY  
MAIL RATE CATEGORIES, 2001

Docket No. MC2001-1

RESPONSE OF UNITED STATES POSTAL SERVICE  
WITNESS KALENKA TO INTERROGATORY OF  
THE OFFICE OF THE CONSUMER ADVOCATE  
(OCA/USPS-T3-1)

The United States Postal Service hereby provides the response of witness Kalenka to the following interrogatory of the Office of the Consumer Advocate filed on April 5, 2001: OCA/USPS-T3-1.

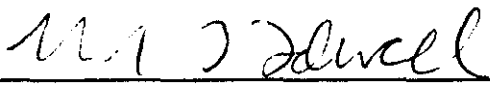
The interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking

  
Michael T. Tidwell

475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1137  
(202) 268-2998; Fax -5402  
April 18, 2001

**RESPONSE OF USPS WITNESS KALENKA TO INTERROGATORY  
OF THE OFFICE OF THE CONSUMER ADVOCATE**

**OCA/USPS-T3-1.**

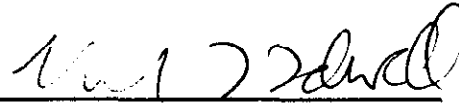
- a. Does the Group One software possessed by ADP have the capability to arrange mailing lists in presort order for pieces mailed at Priority Mail rates? Please explain.
- b. To what extent does ADP currently use the Group One software to presort Priority Mail pieces? What depth of sort does ADP typically achieve? Please explain.

**RESPONSE:**

ADP currently uses the Group One software program to arrange First-Class Mail and Standard Mail in presort order. We do not utilize it for Priority Mail. It is my understanding that the software presently used for First-Class could be applied to Priority Mail with minimal modification.

## CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

  
\_\_\_\_\_  
Michael T. Tidwell

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April 18, 2001